

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**KAYLA MORGAN,
Plaintiff,**

v.

**FUNDAMENTAL CLINICAL AND
OPERATIONAL SERVICES LLC,
Defendant.**

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CIVIL A. NO. 3:24-cv-00971-X

**UNOPPOSED MOTION TO EXTEND DEADLINES TO FILE JOINT PRETRIAL
ORDER AND CONTINUE TRIAL**

Plaintiff Kayla Morgan (“Morgan”) moves the Court to extend the deadline of their joint pretrial order and to continue the trial of this matter until after the Court has ruled on the Defendant’s motion for summary judgment. In support, Morgan respectfully shows the following:

A court may grant a request to extend time, filed before the applicable deadline, for good cause. Fed. R. Civ. P. 6(b)(1)(A). Because the necessity for and, potentially, content of pre-trial materials will depend upon the Court’s ruling on the Defendant’s motion for summary judgment, Morgan requests additional time to file the joint pretrial order.

The current deadline to file the joint pretrial order and motions in limine is July 21, 2025. [Doc 30]. The pretrial conference is currently set for July 28, 2025, and trial is currently scheduled on a two-week docket beginning on August 4, 2025.

Good cause exists to extend the deadlines for filing the pretrial order and motions in limine. On January 3, 2025, Defendant filed its motion for summary judgment. [Doc 22]. Plaintiff timely filed Plaintiff’s response to the Defendant’s motion for summary judgment on January 24, 2025.

[Doc 26]. Defendant filed the Defendant's reply on February 7, 2024 [Doc 29]. The motion is fully briefed and is ripe for the Court's ruling.

Because the Court's ruling on the Defendant's motion for summary judgment has the potential to dismiss the case entirely or change the scope of the issues for trial, an order extending the deadlines to file the joint pretrial order and motions in limine keyed to a number of days — Morgan would suggest 21 days — after the Court's entry of an order on the Defendant's motion for summary judgment will allow the parties to avoid the time and expense of preparing pre-trial materials if the Court finds dismissal of the case to be appropriate, or pre-trial materials that realistically address any issues(s) the Court may find appropriate for trial.

Accordingly, Morgan respectfully requests the Court extend the deadlines to file the joint pretrial order until at least 21 days from the date the Court rules on the Defendant's motion for summary judgment.

Morgan further requests the Court reset the pretrial conference and trial currently set for July 28, 2025, and August 4, 2025, in accordance with this extension.

This request is not for the purpose of delay but rather for the purpose of judicial efficiency and so that justice may be done.

Dated: July 7, 2025.

Respectfully submitted,

/s/ Riley Carter

Riley Carter (Attorney-in-Charge)

Texas Bar No. 24137445

Admitted Pro Hac Vice to the Northern District

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ATTORNEYS FOR PLAINTIFF

/s/ Kayla Morgan

PLAINTIFF KAYLA MORGAN

CERTIFICATE OF CONFERENCE

I certify that on July 7, 2025, I conferred with counsel for Defendant, Jeremy Hawpe, regarding the substance of this motion, and he informed me that Defendant is unopposed.

/s/ Riley Carter _____
Riley Carter

CERTIFICATE OF SERVICE

I certify that on July 7, 2025, I electronically filed the foregoing using the CM/EFC system, which will send notification of such filing to all counsel of record.

/s/ Riley Carter _____
Riley Carter